



Marcia Robinson Lowry  
President &  
Executive Director

Board of Directors:

Alan C. Myers

Chairman & Treasurer

Robin L. Dahlberg

Secretary

Daniel H. Galperin

Jessica B. Gracer

Howard M. Maisel

Alice Rosenwald

Melissa G. Salton

Hershel B. Sarbin

Carol Wilson Spigner

Anne Strickland Squadron

March 31, 2005

VIA FAX – (601) 352-7757  
and REGULAR MAIL

Ms. Betty Mallett  
McGlinchey Stafford PLLC  
City Centre, Suite 1100  
200 South Lamar Street  
Jackson, MS 39201

Re: *Olivia Y. et al. v. Barbour et al.*



Dear Ms. Mallett:

I have yet to receive your promised written response to my March 11, 2005 letter as to Plaintiffs' First Request for Production of Documents. As we discussed last week, and as I noted in my letter of March 25, 2005, you were going to indicate what, if any, additional responsive documents will be produced and Defendants' basis for withholding other responsive documents.

We also anticipate receiving from you by April 14, 2005, the quarterly supplementation of the Named Plaintiff case records pursuant to the Amended Case Management Order. As you will recall, your letter of February 16, 2005, assured us that this production will include those Named Plaintiff case record documents discussed in my letter of February 8, 2005, that were omitted from previous disclosures.

In addition, review of recently produced documents suggests that child-specific case records may also be maintained separately by the Adoption Unit charged with handling the placement statewide of children (like the W. children) whose parental rights have been terminated. See, e.g., DHS 017253 (discussing the responsibilities of the Adoption Unit). Please produce, as required, any child-specific case records on any of the Named Plaintiffs maintained beyond the County files and MACWIS by other DFCS units such as the Adoption Unit.

Thank you for your prompt attention to these matters.

Sincerely yours,

*Eric Thompson /aw*

Eric Thompson  
Plaintiffs' counsel

cc: Wayne Drinkwater & Melody McAnally, Bradley Arant  
Stephen Leech, Esq.  
John Lang, Loeb & Loeb

EXHIBIT

RECORDED

404 Park Avenue South, New York, NY 10016  
Tel: 212-683-2210 • Fax: 212-683-4015 • info@childrensrights.org • www.childrensrights.org